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Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2677
Fax: (303) 966-8244

January 3, 1996

96-RM-ER-0214-KH

M. J. Peters
Kaiser-Hill Company
P. O. Box 464, Bldg. T130C
Golden, CO 80402-0464

TRANSMITTAL OF RMRS COMMENTS ON ASAP PHASE II- AMP-190-96

Action: None required

This letter transmits Rocky Mountain Remediation Services (RMRS) comments on the Accelerated Site Action Project (ASAP) Phase II document to Kaiser-Hill. Thank you for allowing RMRS the opportunity to work and comment on the ASAP document.

If you have any questions or comments, please contact Dennis Schubbe on extension 4309.

A handwritten signature in cursive script, appearing to read "Alan M. Parker".

Alan M. Parker
Vice President
ER Projects

DLS:jg

Attachment:
As Stated

cc:
J. E. Law - RMRS w/Attachments
D. L. Schubbe - RMRS w/Attachments
ERPD Project File (2)

22.015.F

ADMIN RECORD

SW-A-003544

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Rocky Mountain Remediation Services, L.L.C.
Comments on Accelerated Site Action Project Phase II
(Preliminary Draft Rev. 1, December 20, 1995)

General Comments

1. It may not be feasible to convert the pond systems to wetlands without purchase and importation of water and long-term maintenance of delivery facilities. Ground water resources will not support the presence of wetlands (U.S.G.S. Report August 1995) when workers are no longer present at the site. In addition, existing wetlands may no longer exist if ground water recovery systems are installed and impact ground water flow to springs.
2. Soil volume estimates for excavation and thermal desorption should be caveated with appropriate assumptions. These estimates could vary greatly and therefore could substantially affect cost estimates. It may be beneficial to perform a limited cost sensitivity analysis to establish a better understanding of the potential impact of soil volume estimate variability on cost estimates.
3. Cost estimate information should be presented within tables in a manner such that the reader can understand how cost estimates were derived if tables are separated from the report. For instance: are the costs presented as present worth or future worth; what is the interest rate assumed; and what are the time periods assumed? The cost estimates presented appear to be actual capital and operating costs. If the time value of money was not utilized, then the cost estimates can not be compared in valid economic analysis of options.
4. Passive ground water treatment technology is over emphasized without backup information/documentation demonstrating its feasibility. RMRS recommends that Kaiser-Hill, L.L.C. state that passive ground water treatment is the preferred or assumed alternative, not necessarily the final alternative.
5. Assumptions that No Action/No Further Action (NFA) criteria will be met by more than 40 or 50 IHSSs may not be realistic. Given that action will be taken (i.e., the site will be partially covered/capped) then IHSSs will not necessarily have to meet NFA criteria, although the NFA process may be efficiently used to screen IHSSs. Additional NFA criteria for IHSSs which will be buried should be developed which are less stringent than those required for clean closure as part of a No Action or No Further Action decision as defined by CERCLA.